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*Counsel for Individual and Representative
Plaintiffs and the Proposed Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

J. DOE 1 et al.,

Individual and Representative Plaintiffs,

v.

GITHUB, INC., et al.,

Defendants.

Lead Case Nos. 4:22-cv-06823-JST

**DECLARATION OF JOSEPH R. SAVERI
IN SUPPORT OF JOINT LETTER BRIEF
REGARDING OPENAI DEFENDANTS'
RESPONSES TO PLAINTIFFS'
INTERROGATORY Nos. 2, 5, 8, and 9**

1 I, Joseph R. Saveri, declare as follows:

2 1. I am an attorney duly licensed to practice in the State of California. I am a partner and
3 founder of the Joseph Saveri Law Firm, LLP, counsel of record for Plaintiffs Does 1–4 in this action. I
4 have personal knowledge of the matters stated herein and, if called upon, I could competently testify
5 thereto. I make this declaration pursuant to 28 U.S.C. Section 1746 in support of Plaintiffs’ Motion to
6 Maintain Confidentiality Designations for Plaintiffs’ True Names Pursuant to Section 6.3 of the Stipulated
7 Protective Order (ECF No. 63).

8 2. Attached hereto as **Exhibit 1** is a true and correct copy of Plaintiff’s First Set of
9 Interrogatories to Defendants OpenAI, Inc.; OpenAI, L.P.; OpenAI GP, L.L.C.; OpenAI OpCo, L.L.C.;
10 OpenAI Startup Fund GP I, L.L.C.; OpenAI Startup Fund I, L.P.; and OpenAI Startup Fund Management,
11 LLC, dated and served on July 19, 2023.

12 3. Attached hereto as **Exhibit 2** is a true and correct copy of Defendants OpenAI, Inc.;
13 OpenAI, L.P.; OpenAI GP, L.L.C.; OpenAI Startup Fund GP I, L.L.C.; OpenAI Startup Fund I, L.P.;
14 OpenAI Startup Fund Management, LLC; and OpenAI OpCo, L.L.C.’s Responses to Plaintiff Doe 1’s
15 First Set of Interrogatories, dated and served on August 25, 2023.

16 4. Attached hereto as **Exhibit 3** is a true and correct copy of a letter from me, Joseph R.
17 Saveri, to Joseph C. Gratz, counsel for Defendants OpenAI, Inc.; OpenAI, L.P.; OpenAI GP, L.L.C.;
18 OpenAI OpCo, L.L.C.; OpenAI Startup Fund GP I, L.L.C.; OpenAI Startup Fund I, L.P.; and OpenAI
19 Startup Fund Management, LLC, dated September 20, 2023.

20 5. Attached hereto as **Exhibit 4** is a true and correct copy of a letter from Allyson R. Bennett,
21 counsel for Defendants OpenAI, Inc.; OpenAI, L.P.; OpenAI GP, L.L.C.; OpenAI OpCo, L.L.C.; OpenAI
22 Startup Fund GP I, L.L.C.; OpenAI Startup Fund I, L.P.; and OpenAI Startup Fund Management, LLC to
23 me, Joseph R. Saveri, dated November 6, 2023.

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/s/ Joseph R. Saver
Joseph R. Saveri